

REMARKS

Applicants have carefully reviewed this application in light of the Office Action mailed July 18, 2007. Claims 2 and 21 were previously cancelled without prejudice or disclaimer. Claims 1, 3-20 and 22-28 are pending in this Application. Claims 1, 3-20 and 22-28 stand rejected under 35 U.S.C. §103. Claims 1, 20, and 24 have been amended to further define various features of Applicants' invention. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 103

Claims 1, 5-15, 18, 20, 24, 27 and 28 stand rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,996,450 issued to Edward J. Suttle (*"Suttle"*) in view of U.S. Patent No. 6,970,639 issued to John Mark McGrath (*"McGrath"*).

Claims 3, 4, 22, 23, 25 and 26 stand rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over the combination of *Suttle* and *McGrath*, as applied to claim 1, in view of U.S. Patent No. 6,076,080 issued to William F. Morscheck (*"Morscheck"*).

Claims 16-17 and 19 stand rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over *Suttle*.

Suttle discloses an automated manufacturing system and method for manufacturing photomasks based on information provided by a customer. (Col. 5, lines 40-44). The method and system includes software for processing photomask design data, where the software is configured to extract information from customer design data and arrange such data in a format suitable for performing photomask manufacturing tasks. (Col. 5, lines 57-61).

McGrath discloses an editing system for editing video and/or audio source content. (Col. 1, lines 7-12). The system includes source metadata associated with the source content, template metadata defining a certain style for content, and a processing unit configured to apply the template to the source content by comparing the source metadata with the template metadata in order to arrange portions of the source content to produce an edited content sequence. (Col. 1, lines 29-39).

Claims 1 and 24, as amended, recite a method comprising “automatically selecting a template including customer specifications based on the predefined set of customer requirements related to the manufacture of the photomask component.”

Claim 20, as amended, recites a system operable to “automatically process the product order information file using a rules engine to apply the predefined set of customer requirements to the product order information file such that the product order information file is loaded into an order entry module.”

Applicants respectfully submit that the cited references fail to disclose every element of Applicants’ invention. Further, there is no motivation, suggestion or teaching to combine either *Suttile* and *McGrath*. For instance, neither *Suttile* nor *McGrath*, disclose or suggest a method including the step of “automatically selecting a template including customer specifications based on the predefined set of customer requirements related to the manufacture of the photomask component,” as recited by amended Claims 1 and 24. Additionally, *Suttile* and *McGrath*, alone or in combination, fail to teach a system for electronic order entry and automatic processing of a photomask including executable instructions operable to “select a template including customer specifications based on the predefined set of customer requirements related to the manufacture of the photomask component,” as recited by amended Claim 20.

Regarding Claims 1, 20 and 24, the Examiner alleges that *McGrath* discloses “automatically selecting a template including customer specifications based on at least one criteria (col. 2, lines 2-14; col. 10, lines 50-52).” (Office Action, pages 3 and 7). However, the cited sections of *McGrath* fail to disclose the limitation of Claims 1, 20 and 24. Instead, *McGrath* merely discloses:

The present invention takes advantage of the current proliferation in metadata associated with source content (hereafter referred to as source metadata) to improve the efficiency of the editing process. More particularly, in accordance with the present invention, a template is provided which defines a desired style for content, template metadata being provided within the template to define the desired style. The template metadata essentially provides selection or match criteria for the source metadata. The template is stored in a storage, for example on a hard disk, diskette, CDROM, etc., and the editing system is then arranged to retrieve the template and apply it to

the source content by comparing the source metadata with the template metadata. The portions of source content are then arranged in accordance with the comparison to produce the edited content sequence.

(Col. 1, line 65 – Col. 2, line 14) (emphasis added). Additionally, *McGrath* teaches the following about template metadata:

Each section may have one or more items of metadata associated with it, such metadata being referred to hereafter as template metadata. The template metadata associated with a particular section is used to define the type of content to be associated with that section. There are many types of metadata which may be associated with each section of the template, Table 1 below providing some examples of types of metadata:

TABLE 1

Business information: Cameraman,
Journalist, Assignment number, Copyright.
Equipment specification: Camera Serial
Number, Lens Parameters, Technical
Features.
Material identification: Unique Material
Identifiers (UMID)
Location markers: GPS, Timezone,
Fixed location (e.g. Speaker's microphone
in UK Parliament, or Goal end camera)
User defined marking: Good shot
markers, production comments.
External motion: Global camera motion
through zoom or panning.
Internal motion: Object trajectory, such
as in sports, or human motion (i.e. a
cohesive object such as a person with a
"relatively" slowly changing motion)
Transition marking: Automated
identification and categorisation of cut,
dissolve, fade.
Shot Composition marking: Zoom and
wide angle marking.
Noise marking: High background noise
(probably high power low frequency noise)

or low noise (i.e. silence portions).
Tempo/Beat marking: Rhythm, period
sound events.
Colour/Contrast change: Could be
caused by camera flash, lighting effects.
Pitch/Volume modulation: This is the
case for long term audio events such as
music or speech dialogues.
Audio Pattern/Discontinuity: Such as
rhythm, tempo, pace.

(Col. 7, lines 6-44) (emphasis added). Thus, template metadata as defined by *McGrath* is merely a general description of the types of content that can be associated with A/V material. (See Col. 5, lines 24-26). *McGrath* fails to teach, suggest or disclose Applicants' claimed invention of selecting a template based on a predefined set of customer requirements. Therefore, *McGrath* cannot render obvious Claims 1, 20 and 24.

Given that Claims 3-19 depend from Claim 1, Claims 22 and 23 depend from Claim 20, and Claims 25-28 depend from Claim 24, Applicants respectfully submit that Claims 3-19, 22, 23 and 25-28 are allowable. As such, Applicants respectfully request that the Examiner withdraw the rejections and allow Claims 1, 3-20, and 22-28.

CONCLUSION

Applicants appreciate the Examiner's careful review of the Application. Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. For the foregoing reasons, Applicants respectfully request reconsideration of the rejections and full allowance of Claims 1, 3-20 and 22-28.

Applicants believe there are no fees due at this time, however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2581.

Respectfully submitted,
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